

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

D.V.D.; M.M.; E.F.D.; and O.C.G.,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY;
Kristi NOEM, Secretary, U.S. Department of
Homeland Security, in her official capacity; Pamela
BONDI, U.S. Attorney General, in her official
capacity; and Antone MONIZ, Superintendent,
Plymouth County Correctional Facility, in his official
capacity,

Defendants.

Case No. 25-cv-10676-BEM

JOINT STIPULATION TO VACATE L.R. 16.1(d) JOINT STATEMENT DEADLINE

Plaintiffs D.V.D., M.M., E.F.D., and O.C.G. (“Plaintiffs”) and Defendants U.S. Department of Homeland Security (DHS), *et al.* (the parties) hereby stipulate that the current July 24, 2025 deadline to file a joint discovery and case management statement per Local Rule 16.1(d) be vacated. In support of this, the parties state the following:

- On July 3, 2025, the Court ordered the parties to “confer and submit a joint statement regarding discovery and case management, per Local Rule 16.1(d), no later than July 24, 2025.” Dkt. 187.
- On July 15, 2025, Plaintiffs filed a Motion for Indicative Ruling (Dkt. 191), Motion to Stay Discovery Related to TRO Compliance (Dkt. 195), and Motion for Partial Summary Judgment (Dkt. 193).
- On July 18, 2025, Defendants filed a Motion to Quash and for Relief from Discovery Order

(ECF No. 197).

- On July 23, 2025, the Court issued an order “directing the Parties to meet and confer on Plaintiffs’ Motion for an Indicative Rule (Dkt. [191]) and Motion to Stay Discovery (Dkt. [195]) and submit a joint status report by 3:00 p.m. on Friday, July 25, 2025.” Dkt. 198.

In light of these recent filings, as well as the Court’s order directing the parties to submit a joint status report on July 25, the parties have conferred and respectfully submit that it would not be productive to address the discovery and case management topics in a L.R. 16.1(d) statement at this time because those topics will necessarily depend on the outcome of the parties’ pending motions (Dkts. 191, 193, 195, 197). Instead, the parties request leave to address a new proposed deadline for filing a L.R. 16.1(d) statement in the joint status report that they file with the Court on Friday, July 25.

Respectfully submitted,

s/Trina Realmuto

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

s/ Matthew P. Seamon
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Dated: July 23, 2025